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PATENT

Docket No. AT9-98-266

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

OFFICIAL

In re application of: Ehnebuske et al.

Serial No. 09/204,973

Filed: December 3, 1998

For: Method and Apparatus for
Applying Business Rules in an Object
Model Driven Context§
§
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§
§
§

Group Art Unit: 2124

Examiner: Ingberg, Todd D.

#13
J. Clayton
12-2-03Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450ATTENTION: Board of Patent Appeals
and Interferences

Certificate of Transmission Under 37 C.F.R. § 1.8(a)

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November 24, 2003.

By:

Rebecca Clayton

APPELLANT'S REPLY BRIEF

This reply brief is in furtherance of the Appeal Brief filed in this case on July 2, 2003 and is in response to the Examiner's Answer mailed September 24, 2003.

The fees required under § 1.17(c), and any required petition for extension of time for filing this reply brief and fees therefore, are dealt with in the accompanying TRANSMITTAL OF REPLY BRIEF.

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CHANGE IN STATUS OF CLAIMS

Appellants thank Examiner Ingberg for the allowance of claims 2-11, 12-15, 23-28, 31-35, 43-45, 46, 48-52, 55-59, 67-69, 70, 72-76, 79-83, 91-94 and 96-98. However, for the reasons set forth in Appellants' Brief filed July 2, 2003, and the reasons set forth hereafter, Appellants respectfully submit that all of the claims are directed to allowable subject matter and that the application is in condition for allowance. In view of the Examiner's change in position with regard to these claims, the status of the claims is updated as follows:

A. TOTAL NUMBER OF CLAIMS IN APPLICATION

Claims in the application are: 1-28, 31-39, 41-52, 55-63, 65-76, 79-87 and 89-98.

B. STATUS OF ALL THE CLAIMS IN APPLICATION

1. Claims canceled: 29, 30, 40, 53, 54, 64, 77, 78 and 88.
2. Claims withdrawn from consideration but not canceled: NONE.
3. Claims pending: 1-28, 31-39, 41-52, 55-63, 65-76, 79-87 and 89-98.
4. Claims allowed: 2-15, 23-28, 31-35, 43-46, 48-52, 55-59, 67-70, 72-76, 79-83, 91-94 and 96-98.
5. Claims rejected: 1, 16-22, 36-39, 41-42, 47, 60-63, 65-66, 71, 84-87, 89, 90 and 95.

C. CLAIMS ON APPEAL

The claims on appeal are: 1, 16-22, 36-39, 41-42, 47, 60-63, 65-66, 71, 84-87, 89, 90 and 95. The attached appendix is an update to the appendix provided with Appellants' Brief and removes those claims that are now indicated as being allowable.

ISSUES

The only issue on appeal is whether all of claims 1, 16-22, 36-39, 41-42, 47, 60-63, 65-66, 71, 84-87, 89, 90 and 95 are anticipated by Martin, "Principles of Object-Oriented Analysis and Design."

GROUPING OF CLAIMS

The claims do not stand or fall together. The claims stand or fall in accordance with the following groupings of claims, the reasons for these groupings being provided in the arguments presented hereafter:

Group I:	claim 1;
Group II:	claim 16 (formerly Group VIII);
Group III:	claims 17 and 22 (formerly Group IX);
Group IV:	claim 18 (formerly Group X);
Group V:	claim 19 (formerly Group XI);
Group VI:	claim 20 (formerly Group XII);
Group VII:	claim 21 (formerly Group XIII);
Group VIII:	claims 36-39, 41, 60-63, 65, 84-87 and 89 (formerly Group XV); and
Group IX:	claims 42, 47, 66, 71, 90 and 95 (formerly Group XVI).

RESPONSE TO EXAMINER'S ANSWER

Groups I-IX are allowable over the cited prior art, Martin, for at least the reasons set forth in Appellants' Brief filed July 2, 2003, the arguments being hereby incorporated by reference. The following remarks are offered in rebuttal of the Examiner's statements set forth in the Examiner's Answer.

I. Examiner's Interpretation of Terms

In the Examiner's Answer, pages 28-35, the Examiner maintains his interpretations of certain terms (which in some cases may or may not be actually used in the claims). Appellants have stated their objection to this practice by the Examiner and have given reasons why Appellants' claims should not be limited in their scope to the Examiner's interpretation of any of these terms. Appellants' basic position is that the Examiner is not the authority to determine the limitations in scope of these terms. To the contrary, the scope of the claims is to be determined by a court of competent jurisdiction based on the common use of these terms, the manner by which the terms are used in the specification, the prosecution history, and other secondary sources. This is the very purpose for the use of Markman hearings – to determine the scope and meaning of terms in claims. Appellants have never accepted the Examiner's interpretations nor should Appellants be limited to interpretations based on a single Examiner's opinion as to what these terms should mean. Thus, while Appellants appreciate that the Examiner believes that his interpretations provide a broader scope to the claims (page 35 of the Examiner's Answer) and that Appellant's refusal to accept these interpretations somehow would be more limiting, Appellants respectfully request that the Board indicate that the scope of Appellants' claims are not limited to the personal interpretations of the Examiner.

II. Group I – Claim 1

With regard to claim 1, the Examiner merely states that the Board should refer to page 122 of the Martin reference and Chapters 9 and 10 of Martin. These sections of the Martin reference have been discussed at length in Appellants' Brief and thus, the arguments will not be repeated here. Suffice it to say, the Examiner has not provided so much as a single argument in rebuttal of Appellants' arguments but merely points back to these sections to supposedly allow the reference to speak for itself. For the reasons stated in Appellants' Brief, Appellants respectfully submit that these sections of the Martin reference do not say much regarding the specific features of claim 1.

The Examiner states that Appellants' arguments are a "refusal to acknowledge the most basic concepts of programming" and that Appellants have "attempted to distance themselves

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from basic knowledge in the art." However, rather than actually pointing to any particular portion of Martin the explicitly teaches the specific features of claim 1, the Examiner again merely points to large portions of the Martin reference that provide general teachings regarding object-oriented programming but do not speak to any of the specific features recited in the claims.

At no time have Appellants tried to "distance themselves" from basic knowledge in the art or refuse to acknowledge the basic concepts of programming. To the contrary, Appellants' very arguments are that the basic concepts of programming set forth in Martin do not teach or suggest the features recited in claim 1 and the Examiner has not shown how these basic concepts anticipate the specific features in claim 1. It is rather evident that the Examiner cannot support his position when faced with Appellants' arguments set forth in Appellants' Brief because the Examiner merely points back to large sections of the reference (the same sections originally cited by the Examiner) without making any attempt to illustrate how these sections overcome Appellants' arguments and instead, makes general allegations about Appellants' refusal to accept the Examiner's position with regard to alleged "basic knowledge in the art."

The simple truth is neither Martin nor any alleged "basic knowledge in the art", teaches or even suggests the specific features recited in claim 1. A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). The Martin reference does not provide sufficient teachings to identically show, in that single reference, every element of the claimed invention arranged as they are in the claims. Moreover, the Examiner is engaged in applying broad "conceptual" teachings of Martin, i.e. is looking at what the reference broadly teaches, without regard for the actual specific teachings of Martin or the specific features recited in the claims.

As stated in Appellants' Brief, the Examiner's entire rejection is based on a generalization of the teachings in Martin and a generalization of the features recited in claim 1. That is, the Examiner's rejection of claim 1 is directly contrary to accepted practice and case law precedent.

Therefore, the Board should not sustain the Examiner's rejection of Group I - claim 1.

III. Group II (Formerly Group VIII)- Claim 16

With regard to Appellants' arguments, the Examiner merely responds by stating:

Appellant's argument that "associating rules based on a position of a control point in a method" is not taught. As seen in claim one Rules are linked to the constructs taught in Chapter 9.

Chapter 10

Rules Linked to Diagram – page 136 (like attach)

Stimulus/Response Rules – page 137

Combining Rules and Chapter nine concepts – page 140 to 142

The rejection is written to one of ordinary skill in the art of object-oriented programming. The need to explain how the constructs of chapters 9 and 10 are implemented in an object-oriented environment is not of ordinary skill. The Martin reference titled "Principles of Object-Oriented Analysis and Design" provides a teaching on building object oriented CASE tools. The Examiner does not understand how the Appellant would not understand what a method is and how the basics of object technology relate to constructs taught in Martin.

Appellants are well aware of what a method is and are quite versed in the area of object-oriented programming. What is not clear to Appellants is how the Examiner can take general teachings in Martin, which do not say anything regarding defining rules for at least one control point based on an object's class name, method name, and position of the at least one control point in the method, and somehow conclude that this specific feature is anticipated by the general teachings of the Martin reference. All the Examiner states is that he need not explain how the constructs in chapters 9 and 10 of Martin are implemented in object-oriented environments and that it should be clear how the basics of object technology relate to constructs taught in Martin.

The Examiner does not appreciate Appellants argument, which is that there are no "constructs" in Martin that would anticipate the features recited in the claim 16, even if one were to "relate" object technology to these constructs. That is, nothing in Martin teaches to define rules for at least one control point based on an object's class name, method name, and position of the at least one control point in the method. Merely associating methods with the points in an event diagram does not anticipate this specific feature. Yet again, the Examiner is merely

generalizing the teachings of Martin and generalizing the features of the claimed invention so that the Examiner may reject one generalization with the other. The Examiner has failed to appreciate or examine the specific features recited in claim 16. Therefore, the Board should not sustain the rejection of claim 16.

IV. Group III (Formerly Group IX) – Claims 17 and 22

With regard to Appellants' arguments, the Examiner merely makes reference to his remarks regarding claim 1 (Group I) and states that the arguments are not persuasive. Therefore, Appellants' need not provide any further response other than the arguments provided in Appellants' Brief and the remarks offered above with regard to Group I. Suffice it to say, the Examiner has not shown where Martin anticipates the specific features of claims 17 and 22 and thus, the Board should not sustain the Examiner's rejection of claims 17 and 22.

V. Group IV (Formerly Group X) – Claim 18

With regard to Appellants' arguments, the Examiner merely responds that "the Examiner believes this issue was resolved with claim 1 and the linking rules (chapter 10) more than covers the argument above." There is nothing in the Examiner's remarks regarding claim 1 addresses, or in chapter 10 of Martin that teaches, affecting the behavior of an object based on running the rules associated with a control point, wherein the rules are associated with the control point based on the object's class name, method name, and position of the at least one control point in the method. The Examiner has not addressed these specific features and rests the entire rejection on a generalization, as previously discussed. Therefore, the Board should not sustain the Examiner's rejection of claim 18.

VI. Group V (Formerly Group XI) – Claim 19

With regard to Appellants' arguments, the Examiner states that the "topics" in chapters 9 and 10 are implemented in object technology and alleges that "Appellant seems to still be arguing this fact." Once again, the Examiner fails to appreciate Appellants' argument. Appellants'

argument is not that the "topics" of chapters 9 and 10 in Martin are not implemented in object oriented technology (after all, the title of the Martin reference is "Principles of Object-Oriented Analysis and Design"). To the contrary, Appellants' argument is that these "topics" of chapters 9 and 10 of Martin do not teach the features of claim 19, whether implemented in object-oriented technology or not. That is, there is nothing in the "topics" of chapters 9 and 10 regarding affecting the behavior of an object based on running rules associated with a first control point including associating different rules to a control point.

The Examiner's response is indicative of Appellants' position that the Examiner is rejecting generalizations of the claimed features with generalizations of the teachings in the Martin reference. This is clear in that the Examiner makes reference to the "topics" of chapters 9 and 10 of Martin rather than citing any particular teaching in Martin that explicitly states running rules associated with a first control point to affect the behavior of an object by associating different rules with a control point. There simply is nothing in Martin that specifically teaches this feature and the Examiner has again failed to show where this specific feature is taught anywhere in Martin.

The Examiner's entire position with regard to the Martin reference is that it teaches basic "constructs" that the Examiner believes could somehow be combined to arrive at Appellants' claimed invention. However, the Examiner fails to appreciate that, even if the Examiner were correct, *arguendo*, there is nothing in Martin that teaches, or even suggests, to combine these "constructs" in the particular manner necessary to arrive at the claimed features. The only teaching or suggestion to do so comes from Appellants' own disclosure. Thus, at the very least, the Martin reference does not anticipate the claimed features and, moreover, does not obviate the claimed features because there is nothing in Martin that would suggest to one of ordinary skill in the art, without having benefit of Appellants' disclosure, to combine these "constructs" to arrive at Appellants' claimed invention.

Thus, Appellants respectfully submit that the Examiner has not shown where the features of claim 19 are taught in the Martin reference. Therefore, the Board should not sustain the Examiner's rejection of claim 19.

VII. Group VI (Formerly Group XII) – Claim 20

The Examiner's response to Appellants' arguments regarding claim 20 do not address Appellants' actual arguments. That is, Appellants argued that the event diagram shown on page 163 of Martin has nothing to do with affecting the behavior of an object based running rules associated with a control point, wherein affecting the behavior includes defining another control point. The Examiner responds by stating that Appellants' arguments regarding flow control have been previously addressed and that the Examiner disagrees that the control condition would always be TRUE. This has nothing to do with Appellants' actual argument. The Examiner has failed to show how the event diagram of page 163 of Martin somehow teaches to affect the behavior of an object by running rules associated with a control point such that another control point is defined. There simply is nothing in any part of Martin that teaches this specific feature. Thus, the Examiner has not provided any support for the rejection of claim 20 and has not overcome Appellants' arguments. Accordingly, the Board should overturn the Examiner's rejection of claim 20.

VIII. Group VII (Formerly Group XIII) – Claim 21

Regarding Appellants arguments with reference to claim 21, the Examiner merely responds by stating that the Examiner did not interpret the reference as offering only one control point to model a solution and that the argument with regard to active control points was covered in the Examiner's remarks referencing claim 1. Yet again, the Examiner fails to appreciate Appellants' argument. Appellants argued that Martin does not teach to affect the behavior of an object based on the running of rules associated with a control point wherein affecting the behavior includes associated rules to a second control point. Nowhere in Martin is it taught to associate rules with a control point based on the running of rules associated with another control point.

The Examiner's statement that there may be more than one control point in a model does not teach this specific feature. There may be a thousand control points in a model taught by Martin, however there is nothing in Martin that teaches to associate rules with one of these control points based on the running of rules associated with another control point. Yet again, the

Examiner seems to be stuck on generalizations and fails to "appreciate the trees, for the forest." The Examiner cannot merely generalize the reference and the claims and then rejection generalization with generalization. This is clearly improper and is the basis for every rejection made by the Examiner. Once again, the Board should not sustain the Examiner's rejection of claim 21 because the Examiner has not shown where the features of claim 21 are anticipated by the Martin reference.

IX. Group VIII (Formerly Group XV) – Claims 36-39, 41, 60-63, 65, 84-87 and 89

With regard to Appellants' arguments, the Examiner states that he did not expect "word" matching but "concept" matching, that "helper" methods are known to those of ordinary skill in the art, and that "helper" methods are inherent and present in languages such as ANSI standard C++. Once again, the Examiner fails to address Appellants' actual arguments. Appellants' argument is that the concepts of reuse and inheritance in Martin on pages 266-268 do not teach the features of claims 36-39, 41, 60-63, 65, 84-87 and 89.

Rather than addressing the Examiner's initial position that reuse and inheritance somehow teach the features of claims 36-39, 41, 60-63, 65, 84-87 and 89, the Examiner instead attempts to change his position and introduces the concept of "helper" methods. Appellants' arguments with regard to "helper" methods were offered to rebut the Examiner's attempt to avoid the fact that Martin does not teach the features of the claims and introduce some new concept that is not present within the cited portions of Martin. In other words, Appellants' arguments are responsive to the Examiner's attempt to change the playing field midstream without changing the basis for the rejection.

The fact is, nowhere in the cited sections of Martin are these "helper" methods taught or suggested. The Examiner has attempted to introduce new and alleged teachings that are not explicitly taught by the cited reference and guised these new and alleged teachings as being "inherent" when there simply is no support in the Martin reference for such teachings to be "inherent." If the Examiner wishes to introduce new teachings that are outside the actual teachings of Martin, the Examiner must revoke the current rejection and provide a new rejection with a reference that clearly illustrates these alleged teachings. Simply because the Examiner believes these teachings to be well known and "inherent" does not mean that they are. The

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Examiner must support such allegations by evidence in the form of teachings in a reference or an affidavit. In the present case, the Examiner has done neither.

The Examiner states that Appellants' position that the methods of Martin could not fill the role of "helper" methods is not considered "inherent in the art." It is not clear what the Examiner means by this statement, however, Appellants never argued that any alleged methods in Martin could not act as "helper" methods, whatever they may be. To the contrary, Appellants' argument is that Martin does not teach "helper" methods at all and the Examiner has not shown where these alleged "helper" methods are taught in Martin or how these "helper" methods anticipate the features of claims 36-39, 41, 60-63, 65, 84-87 and 89. Thus, even if the alleged methods of Martin were able to be "helper" methods, there still is nothing in Martin that teaches the specific features of these claims. Therefore, the Board should overturn the rejection of claims 36-39, 41, 60-63, 65, 84-87 and 89.

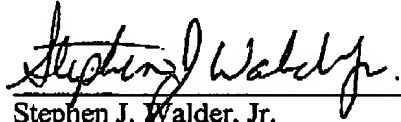
X. Group IX (Formerly Group XVI) – Claims 42, 47, 66, 71, 90 and 95

Regarding Appellants arguments with regard to claims 42, 47, 66, 71, 90 and 95, the Examiner merely states that these arguments are addressed in his response to the arguments presented with regard to claim 1. As with the arguments presented above referencing claim 1, the Examiner again fails to support his rejection of the claims. There simply is nothing in Martin that teaches that a control point may be active or inactive. To the contrary, if a condition exists in the event diagram of Martin, it must be active – it either exists or it does not. The Examiner has failed to rebut this argument or show where these features are taught anywhere else in the Martin reference. Thus, again, the Board should overturn the Examiner's rejection of claims 42, 47, 66, 71, 90 and 95.

Conclusion

In view of the above, Appellants respectfully submit that Martin does not teach each and every feature of claims 1, 16-22, 36-39, 41-42, 47, 60-63, 65-66, 71, 84-87, 89, 90 and 95 as is required under 35 U.S.C. § 102. Therefore, Appellants respectfully request that the Board of Patent Appeals and Interferences overturn the rejection of these claims.

Respectfully submitted,



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APPENDIX OF CLAIMS

The text of the claims involved in the appeal are:

1. A computer implemented process for applying a set of rules, the process comprising:
 - (a) placing a pre-method control point before logic of a method and post-method control point after the logic of the method;
 - (b) associating a set of rules with each control point based on a class of object in which the method resides, name of the method, and type of control point, whether the pre-method control point or the post-method control point;
 - (c) invoking the method, wherein encountering each control point during the execution of the method comprises:
 - (i) determining if the encountered control point is active;
 - (ii) on the basis of an active control point:
 - 1) selecting rules based on a set of rules associated with the active control point associated in step (b);
 - 2) running the selected rules;
 - 3) obtaining results from running the rules; and
 - 4) combining the results using a combining algorithm specified by the control point.
16. A computer implemented process for applying a set of rules comprising:
 - (a) defining an object;
 - (b) defining at least one method in the object;

- (c) defining at least one control point in the at least one method;
- (d) defining rules to the at least one control point on basis the object's class name, method, name, and position of the at least one control point in the method.

17. In the process of claim 16, further comprising the step of activating at least one control point having associated rules.

18. The process of claim 16 further comprises:

- (e) encountering a first control point;
- (f) running the rules associated with the first control point; and
- (g) affecting behavior of the object base on running the rules associated with the first control point.

19. In the process of claim 18, the step of affecting the behavior of the object further comprises:

- (h) associating different rules to a control point.

20. In the process of claim 18, the step of affecting the behavior of the object further comprises:

- (h) defining another control point.

21. In the process of claim 18, the step of modifying the object further comprises:

- (h) associating rules to a second control point.

22. In the process of claim 16, further comprising a step of deactivating the at least one control point.
36. A computer implemented process for defining a rule comprising:
- creating the rule;
 - associating the rule with an object class;
 - associating the rule with a method within the object class;
 - associating the rule with an occurrence of a control point within the method; and
 - associating the rule with another method within the object class.
37. A computer implemented process for defining a rule as in claim 36 wherein the occurrence of the control point within the method being before method logic.
38. A computer implemented process for defining a rule as in claim 36 wherein the occurrence of control point within the method being after method logic.
39. A computer implemented process for defining a rule as in claim 36, further comprising:
- associating the rule with another object class.
41. A computer implemented process for defining a rule as in claim 36, further comprising:
- associating the rule with another control point within the method of the object class.

42. A computer implemented process for applying a set of rules, comprising:
- selecting an object class;
 - selecting a method within the object class;
 - invoking the method;
 - processing rules associated with the method comprising:
 - encountering a control point associated with the method;
 - determining if the control point is active; and
 - finding at least one rule associated with an active control point.
47. A computer implemented process for applying a set of rules, comprising:
- selecting an object class;
 - selecting a method within the object class;
 - invoking the method;
 - processing rules comprising:
 - encountering a first control point associated with the method;
 - determining if the first control point is active;
 - executing method logic of the method;
 - encountering a second control point associated with the method;
 - determining if the second control point is active; and
 - finding a set of rules associated with one of the first control point and the second control point, wherein the set of rules contains not less than zero rules.

60. A data processing system for defining a rule comprising:
- creating means for creating the rule;
 - associating means for associating the rule with an object class;
 - associating means for associating the rule with a method within the object class;
 - associating means for associating the rule with an occurrence of a control point within the method; and
 - associating means for associating the rule with another method within the object class.
61. A data processing system for defining a rule as in claim 60 wherein the occurrence of the control point within the method being before method logic.
62. A data processing system for defining a rule as in claim 60 wherein the occurrence of control point within the method being after method logic.
63. A data processing system for defining a rule as in claim 60, further comprising:
- associating means for associating the rule with another object class.
65. A data processing system for defining a rule as in claim 60, further comprising:
- associating means for associating the rule with another control point within the method of the object class.
66. A data processing system for applying a set of rules, comprising:
- selecting means for selecting an object class;

selecting means for selecting a method within the object class;

invoking means for invoking the method;

processing means for processing rules associated with the method comprising:

encountering means for encountering a control point associated with the method;

determining means for determining if the control point is active; and

finding means for finding at least one rule associated with an active control point.

71. A data processing system for applying a set of rules, comprising:

selecting means for selecting an object class;

selecting means for selecting a method within the object class;

invoking means for invoking the method;

processing means for processing rules comprising:

encountering means for encountering a first control point associated with the method;

determining means for determining if the first control point is active;

executing means for executing method logic of the method;

encountering means for encountering a second control point associated with the method;

determining means for determining if the second control point is active;

finding means for finding a set of rules associated with one of the first control point and the second control point, wherein the set of rules contains not less than zero rules.

84. A computer program product embodied on a computer readable medium containing instructions for a computer implemented process for defining a rule, the instruction comprising:

instructions for creating the rule;

instructions for associating the rule with an object class;

instructions for associating the rule with a method within the object class;

instructions for associating the rule with an occurrence of a control point within the method; and

instructions for associating the rule with another method within the object class.

85. A computer program product for defining a rule as in claim 84 wherein the occurrence of the control point within the method being before method logic.

86. A computer program product for defining a rule as in claim 84 wherein the occurrence of control point within the method being after method logic.

87. A computer program product for defining a rule as in claim 84, further comprising:
instructions for associating the rule with another object class.

89. A computer implemented process for defining a rule as in claim 84, further comprising:
instructions for associating the rule with another control point within the method of the object class.

90. A computer program product embodied on a computer readable medium containing instructions for a computer implemented process for applying a set of rules, the instruction comprising:

- instructions for selecting an object class;
- instructions for selecting a method within the object class;
- instructions for invoking the method;
- instructions for processing rules associated with the method comprising:
 - instructions for encountering a control point associated with the method;
 - instructions for determining if the control point is active; and
 - instructions for finding at least one rule associated with an active control point.

95. A computer program product embodied on a computer readable medium containing instructions for a computer implemented process for applying a set of rules, the instruction comprising:

- instructions for selecting an object class;
- instructions for selecting a method within the object class;
- instructions for invoking the method;
- instructions for processing rules comprising:
 - instructions for encountering a first control point associated with the method;
 - instructions for determining if the first control point is active;
 - instructions for executing method logic of the method;
 - instructions for encountering a second control point associated with the method;
 - instructions for determining if the second control point is active;

instructions for finding a set of rules associated with one of the first control point and the second control point, wherein the set of rules contains not less than zero rules.

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: **Ehnebuske et al.**Serial No.: **09/204,973**Filed: **December 3, 1998****For: Method and Apparatus for
Applying Business Rules in an Object
Model Driven Context****35525**PATENT TRADEMARK OFFICE
CUSTOMER NUMBER§
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§Group Art Unit: **2124**Examiner: **Ingberg, Todd D.**Attorney Docket No.: **AT9-98-266**Certificate of Transmission Under 37 C.F.R. § 1.8(a)I hereby certify this correspondence is being transmitted via facsimile to the
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By:

Rebecca Clayton
Rebecca ClaytonTRANSMITTAL DOCUMENTCommissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

ENCLOSED HEREWITH:

- Appellant's Reply Brief (37 C.F.R. 1.192)

No fees are believed to be required. If, however, any fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0447. No extension of time is believed to be necessary. If, however, an extension of time is required, the extension is requested, and I authorize the Commissioner to charge any fees for this extension to IBM Corporation Deposit Account No. 09-0447.

Respectfully submitted,

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Facsimile (972) 367-2002**Facsimile Cover Sheet**

To: Assistant Commissioner of Patents for Examiner Todd D. Ingberg Group Art Unit 2124	Facsimile No.: 703/872-9306
From: Rebecca Clayton Legal Assistant to Stephen J. Walder, Jr.	No. of Pages Including Cover Sheet: 23
Message: Enclosed herewith: <ul style="list-style-type: none">• Transmittal Document; and• Appellant's Reply Brief.	
Re: Application No. 09/204,973 Attorney Docket No: AT9-98-266	
Date: Monday, November 24, 2003	
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